

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

As representative of

THE COMMONWEALTH OF PUERTO
RICO, *et al.*,

Debtors¹

PROMESA
Title III

No. 17 BK 3283-LTS

Re: ECF No. 24045

***BADILLO SAATCHI & SAATCHI INC.'S UNCONTESTED URGENT MOTION TO
EXTEND DEADLINE TO FILE A RESPONSE TO THE FIVE HUNDRED SIXTY-NINTH
OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO
RICO, THE PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY, AND
THE PUERTO RICO PUBLIC BUILDINGS AUTHORITY TO CLAIMS THAT ARE
PARTIALLY SATISFIED AND/OR PARTIALLY ASSERT AMOUNTS FOR WHICH THE
DEBTORS ARE NOT LIABLE***

COMES NOW, Badillo Saatchi & Saatchi Inc. (“BSS”), by and through the undersigned legal counsel, and after meeting and conferring with Debtors’ counsel respectfully submits this urgent uncontested motion (the “Urgent Motion”) to extend the deadline for BSS to file a response to *The Five Hundred Sixty-Ninth Omnibus Objection (Substantive) Of The Commonwealth Of Puerto Rico, The Puerto Rico Highways And Transportation Authority, And The Puerto Rico Public Buildings Authority To Claims That Are Partially Satisfied And/Or Partially Assert Amounts For Which The Debtors Are Not Liable* (the “Five Hundred Sixty-Ninth Omnibus Objection”). Dkt. No. 24045.

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

BACKGROUND

1. BSS filed its Proof of Claim asserting the amount of \$159,316.02 on May 17, 2018 (the “Proof of Claim”). *See* Claim Number 16582.

2. On April 20, 2023, Debtors filed the Five Hundred Sixty-Ninth Omnibus Objection requesting the partial allowance of BSS’s Proof of Claim in the reduced amount of \$5,047.66. *See* Dkt. No. 24045.

3. BSS’s deadline to respond to the Five Hundred Sixty-Ninth Omnibus Objection is due on Monday, May 22, 2023 (the “Response Deadline”). *See Id.* at 1.

RELIEF REQUESTED

1. The undersigned was recently engaged by BSS to represent them in connection with the Five Hundred Sixty-Ninth Omnibus Objection. Because of this, sufficient time is required by counsel to familiarize themselves with the Proof of Claim and to prepare an adequate response to the Five Hundred Sixty-Ninth Omnibus Objection.

2. Counsel for BSS met and conferred with counsel for Debtors today, May 19, 2023, to inform that it would be filing the instant Urgent Motion requesting a 30-day extension to file a response to the Five Hundred Sixty-Ninth Omnibus Objection and to ascertain whether they had an objection to said request. Debtors’ counsel informed that they did not.

3. BSS respectfully requests, on an urgent basis, that the Court grant it a 30-day extension to file its response to the Five Hundred Sixty-Ninth Omnibus Objection, which extension shall commence from the Response Deadline of May 22, 2023, and would be due on June 22, 2023.

COMPLIANCE WITH CASE MANAGEMENT PROCEDURES

4. Pursuant to Paragraph I.H of the *Sixteenth Amended Notice, Case Management and Administrative Procedures* Order (Docket No. 20190-2 of Case No. 17-03283 (LTS)) (the

“CMP Order”), BSS hereby certifies that it has (a) carefully examined the matter and concluded that there is a true need for an urgent decision; (b) not created the urgency through any lack of due diligence; and (c) reasonable, good-faith communications took place with the parties to this adversary proceeding to resolve or narrow the issues before the Court. Specifically, counsel for BSS reached out to counsel for Debtors on May 19, 2023, who informed that they did not have an objection to BSS’s 30-day extension request. In addition, BSS certifies that no prior request for the relief sought herein has been made.

WHEREFORE, BSS hereby requests, on an urgent basis, that the Court (i) enter an order substantially in the form attached hereto as **Exhibit A** granting it a 30-day extension, until June 22, 2023, to file its response to Five Hundred Sixty-Ninth Omnibus Objection; and (ii) enter any other relief that is just or appropriate given the circumstances.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 19th day of May 2023.

CERTIFICATE OF SERVICE: In accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), and the Court’s CMP Order, we hereby certify that a true and exact copy of the foregoing was sent by electronic mail upon all the parties listed in the Master Service List and by U.S. mail upon all the Standard Parties listed in the CMP Order.

MCCONNELL VALDÉS LLC
270 Muñoz Rivera Avenue, Suite 7
Hato Rey, Puerto Rico 00918
P.O. Box 364225
San Juan, PR 00936-4225
Tel: 787-250-5619
Fax: 787-759-9225

By: /s/ Nayuan Zouairabani Trinidad
Nayuan Zouairabani Trinidad
USDC No. 226411
E-mail: nzt@mcvpr.com

By: /s/ Victoria Rivera Lloreñs
Victoria Rivera Lloreñs
USDC No. 307808
E-mail: vrl@mcvpr.com

Attorneys for Badillo Saatchi & Saatchi Inc.